

QA-21423

ADMINISTRATIVE

DOCKET CLERK

96-28

I read 6 DEC 30 12:18 PM
Hours of service and unsafe Drivers. you never here about what
company's put us through. first of all Driving Does not get us
Tired and if it does we pull over, what's wrong is When we bump
a dock we have to unload and breakdown can't freight sometimes
that takes 6 to 10 hrs just for that. we should not have to unload
anything we are Drivers not warehouse people. When there shift day
is over were still Driving all night. if Driver got paid by the
hours not by the mile we would not Drive so fast or so long
all the scientific data don't mean a thing unless you talk
to the Drivers, most of all the over the road Drivers.
Warehouses are making us do more of their work instead of
Driving it should be against the law what we have to do when
were not Driving. how can we be safe when we don't get paid
for our time we get paid by the mile the faster we go the more
we get paid. Now we don't even get paid for the miles we drive
we get paid Book miles what ever they are. The companies
and Brokers push us to the limit everybody knows it in
Washington. if they don't they should be for its to late and
more people start getting killed on the highway. were not
machines like our Trucks are we have to sleep sometime
but nobody cares about us until something bad happens
Then its all our fault. Don't check logs, check
company records monthly. There the ones that push us.
Go right to the head of the problems. you'll see its
not the Drivers. *Gregory*

DOCKET MC-96-28-33

PAGE 1 OF 1

FHWIA 97-2350-16

Dec 16, 1996

ATT:

06 DEC 30 P12:16

Docket Clerk / FHWA Docket # MC-96-28
LEGG./REGS. DIV.

One of the MAJOR problems you folks have in government is that you tend to over think Everything, The simple Reality of The Rules + Regulations ARE is that they ARE Fine, yes some could use some Touching up, I Agree, BUT The Bottom line is that government OR Research organizations Don't Even Bother to listen to anyone who Drives a Truck over The Road For a living, mostly Because people Don't Think we ARE Educated Enough To Understand what people ARE TRYING TO DO ON OUR BEHALF.

The Following ARE Examples of what was Done ON OUR BEHALF.

(1) Deregulation: Short & Simple, IT created mega CARRIERS that Drive wages & Benefits Down Thus Forcing DRIVERS whether they be owner-operators or company DRIVERS to Drive Extra miles To Achieve the same level for their STANDARDS of living. DRIVERS ~~are~~ Forced To Become this way Because they did not want their Families to go without, BUT when you have a BUREAUCRAT drawing \$5,000 per year salary sitting there with Built in cost of living raises & Benefits, IT'S EASY TO ASSUME we ARE ALL getting the same as they ARE, which leads to more safety Regs. in which they Don't have to live with or work in.

(2)

(2) Deregulation Also Brought Down The Driving Standards From 25 yrs old to 21, which diluted & Flooded The Drivers pool, thus Removing From The Market place highly skilled, highly paid professional drivers, All Market Forces Dictate That you Flood A Market with a product The Price goes down on the commodity, I.E. DRIVERS.

(3) Owners, operators are forced to operate in A Market where we can't even pass on our cost of living or Fuel Increases, why, Most carriers who or did operate on government handouts I.E. DRIVER Training subsidies, plus influxes of money from the sale of stocks and bonds plus the fact that under De-Reg, no one knows what the Freight Rate is, Also contrary to Federal law, Large Corp. dictate Rates, So much for Free Enterprise.

(4) Insurance companies have made out like Bandits, lowering Driver standards causes more accidents & more Risks, thus Higher premiums, And the biggest Suck of All is The Double standard imposed on us by The CDL. IF I get A ticket in my Automobile off Duty on my own Time it counts AGAINST my CDL, which has nothing to do with my professional Driving Ability, I Drive 10 times more miles in cities, ~~snow~~ & Rain than most Auto Drivers yet I am held to The standard. I Believe good Rates have their place, But I Also Believe that Driving 100,000^{mi} plus per year, not Including my personal Driving

(3)

Should prove that no government Agency should have the Right to take away my Right to provide for my Family whether it be State or Federal, since I am 10 times susceptible to getting a ticket not like the guy or gal who drives her company loaded car or government car home, at night.

You people in the government have been busting our asses for years, we don't get paid for loading or unloading, yet you want that on time 4 (on-duty not driving) no one says that's why, no money, that simple, we should not even have bumpers, it's a way the Receivers get to pass off the cost of their products to be unloaded, the way it ought to be is, shipper loads, consignee unloads, period, no discussion, and if you are on time for your appointment or delivery after 2 or 4 hrs you should be paid for your time, with that you would not need bumpers, because when it costs them money it will get done but we take the hit, so what the hell, but that's a particular key went out with no-ass, Thanks @ let!

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PAGE 3 OF 10

(H)

SCIENTIFIC DATA, DOES NOT WORK, BOTTOM LINE IS THAT IF A MAN WAS MAKING ENOUGH MONEY IN THIS BUSINESS HE OR SHE WOULD NOT BE RISKING HIS OR HER'S LIFE OR THE GENERAL PUBLIC'S LIFE TRYING TO FEED HIS FAMILY, WE ARE NOT MONKEYS YOU CAN ATTACH WIRES TO AND WATCH, WE LEAD A WHOLESALE AROUND THE CLOCK, 7 DAYS A WEEK, HOW DO YOU DEFINE THAT ON A DATA SHEET, WE DON'T GET UP AT 7 AM AND GO TO BED AT 5 PM & BE DONE WITH OUR DAY, IT GOES MONEY, ALWAYS BACK TO MONEY, THE RULE OUT HERE IS, "YOU KEEP THEM HUNGRY, DON'T LET ANYONE MAKE ENOUGH MONEY OR GET AHEAD ENOUGH TO REALLY BE INDEPENDENT, WHEN THEY CAN REFUSE TO TURN DOWN A LOAD AND STILL BE AHEAD, WE USED TO BE ABLE TO DO THAT, AND YOU DIDN'T HAVE ALL THIS CRAP WE HAVE NOW, WE ~~HAD~~ HAVE MORE RULES & REGS NOW THAN WE HAD WHEN WE WERE REGULATED, IN SHORT, YOU FOLKS FIXED SOMETHING THAT WAS NOT BROKE YOU WERE TOLD IT WAS, AND BY NOT LISTENING AGAIN TO THOSE OF US ON THE FRONT LINES TOLD WHAT WAS CREATED, A NIGHTMARE FOR THE WORKING MAN, A BOON FOR THE INSURANCE COMPANIES, AND WATFOLKS FOR THE SHIPPERS & CONSIGNEES, ALL ON OUR BACKS.

ALSO NOTE VERY CAREFULLY WHEN YOU REMEMBER YOUR BODY TELLS YOU TO STOP NOT SOME COMPUTER, THAT'S WHY WE'VE HAD SO MANY ACCIDENTS, GUYS WERE MEANING WHEN THE COMPUTER TOLD THEM TO STOP AND THEY COULDN'T ^{COPE} ~~COPE~~

(5)

Here are my feelings on on DRIVING hrs, non DRIVING breaks, pay Etc.

DRIVING hrs.

(1) 10 hrs is Fine per Day, That's plenty, But one change should be, if you have 24 continuous hrs off duty, you should go back to your 70 hrs, if you did that we could get the extra miles or time without lowering safety standards, 12 hrs DRIVING per Day would be no different than a guy working AT Ford or GM, or construction that puts in 10 to 12 hrs on the job or a plumber. Then Drivers home at night, then his or her kids to little league or the mall, or gets in his coupon and drives 4 or 5 hrs to a campsite and ends his Day 15 to 16 hrs later, yet with 7 to 8 hrs Rest is back to his on job with no problems, why should we be any different than the rest of the working public, They are more of a Risk to me than I am to them, when DRIVING, Because I don't Risk myself or the load cutting 3 lanes of traffic because I am late for many or Johnny's Ball game.

(3) Non DRIVING, such as line 4, Absolutely should NOT go Against my DRIVING Time, Take Away line 4 and give me an honest 10 hrs or 11 per Day, Fucking waiting to be loaded or unloaded, Eating on whatever has nothing to do, Even inspecting my Equipment, with my DRIVING hrs, At least I am out of my truck walking around, stretching, which brings back my alertness,

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(6)

Rest Breaks:

We don't all sleep the same as you know it
some can go 6 hrs without a break, some 10, BUT
IN ALL REALITY! IF you look at logs, DRIVERS
USUALLY GET OUT OF THEIR TRUCKS EVERY 2 hrs
FOR COFFEE, Potty BREAKS OR POWER NAPS,
WE DO THIS AUTOMATICALLY, WHY BECAUSE WE
GET BORED, PERIOD. BUT 8 hrs off AS IT
IS NOW IS PLENTY, how much can you sleep. AND
TO MUCH SLEEP IS NOT GOOD EITHER.

Pay! yes!!!

I AM CURRENTLY WORKING AT 1970 WAGES, WOW
SURPRISE huh, BUT YOU DON'T BELIEVE THAT,
PROBABLY NOT, WHEN I STARTED IN THIS INDUSTRY
AS A COMPANY DRIVER I WAS MAKING UNION WAGES
IN 1969 AT WAGON FREIGHT LINES OF 18¢ PER MILE
AND 28 ⁵⁰ PER HOUR THEN THAT, WHAT WE GOT NOW
UNDER ~~THE~~ DE-ROSS, 18¢ TO 40¢, NOT WAITING TIME FOR
US TO COME TO WORK, WHAT IN BUSINESS huh?

I HAVE TALKED TO RUSS SWIFT AT R.O.T.T.
THE BOY WHO KILLED HIS KIDS WAS A YOUNG, HOT BOY,
TRYING TO MAKE EXTRA MONEY, GOT TIRED AND KILLED
THEM, WHO SUFFERED THE DRIVER & THE SWIFT FAMILY

YOU PEOPLE REALLY WANT TO HELP
US OUT HERE, COME TO THE TRUCK STOPS IN
AMERICA AND TALK TO THE DRIVERS. THE

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(7)

The Scientists, on Talking heads from the companies, on The America's greatest Drivers They parade in front of your hearings, ~~for~~ These Drivers are usually Retired from the military or some place else and they paint you a Rosy picture of how great it is out here, we didn't have these problems under Regulations, why, money again, we did above average, we made enough money to say NO! when we had to, to the Shippers, we were in control of our Equipment, because we could afford to be, but not any more, low wages & pay produce high risks if you want to pay for your truck or give your Family what they need,

You have a minimum wage for workers we have no time and a half hours out here, and straight time, if you want to hear the Corporations Scream loud & long do the following:

- (A) Bring all owner operators up to a minimum of
- (A1) \$1.25 per min for their power unit, \$1.50 minimum with trailer
- (A2) All company Drivers up to \$4.9 per mile 40⁰⁰ over this wait
- (A3) 40⁰⁰ per hr for O's After 2 hrs waiting time to load or unload, tarp pay ect, same for Co. Drivers 10⁰⁰ to 12⁰⁰
- (A4) Tie this all in with with a mandatory cost of living raise per year. Tied to the government index
- (A5) Give us back our credit Investment for new Equipment

DOCKET

MC-96-28634

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OF

10

(8)

If you Instituted The minimums I suggested you could absolutely leave Everything As It Is, Listen, No Carrier is going to Anything to enhance his or her Drivers, oh, YA, They'll give you nice Trucks with scientific tracking Equipment, For whom, Them or us, or a work out Room, or a TV lounge. Why you have to go, They can Invest in all this scientific data gathering Equipment But won't Raise wages, Hell They charge me For this stuff As part of my contract,

Again I Repeat Follow The Money, They have us Down on our knees, we can't say No, I am going To Feed my Family, Bottom line, with or without you, I would Rather Be with you, you Do The Thing I suggested which you won't Because I Don't have a PH.D. From Harvard, you would not need All The committees you have, Because we ~~go~~ could go Back To Being In Charge of our lives not some computer or geek Dispatcher who never Drive A Truck But Does have a degree in transportation, it All looks good on paper.

When you offer a man Above Average wages & benefits you Attract Only The Best, Only The Best Apply, I Am currently getting 80¢ per mile To my Truck, Fuel is a Dollar thirty three 1.33 At 64mpg That's 22.1¢ per mi For Fuel, 2¢ For Ins,

(9)

5^d For maint, 2^d For health ins, 4^d highway use tax,
5^d For photos & permits, plus tolls, plus home,
plus kids, plus, Retirement, plus taxes,
plus car, home, wife and homeowners ins. you
ADD ALL this up, I Don't have a choice except
to cheat or Risk it, Even you can see that, My
own government says it cost 60^d per mile
to operate a Truck, on average, that leaves me
with 30^d on a 100,000 mile year if I am lucky
with 40,000 income before my home, wife, kids
Retirement, ins. car, health, I Don't get much as
you see, And you Don't need a Degree For MIT,
To see it either.

you probably have gathered by now
I am a little down on ~~our~~ Degreed people, not at all
only from the stand point that, the Intellectually
elite are the only people who are listened to
you may not believe this, But your Phunber
gets paid from the time you call him, we should
be paid well enough to buy new Trucks Every
2 1/2 to 3 yrs, pay our own Retirement, health care
and still have \$5,000 plus for our Families, Being
out 2 weeks to 2 months at a time should have
some reward, we carry America's economic heartbeat
in our hands, And believe me if something ~~isn't~~
isn't done to relieve this pressure out here of
over worked & under paid, some day all hell will
break loose, And we'll all loose over it,

(10)

I'll close by saying this with probably will not be read or even looked at, I have told Russ Swift I would testify on any hearing he wants, but have never been asked, for 24 years plus, I have offered state & federal committees with documentation to testify, never have been asked, guess I'm not smart enough, nor do I have the money to be heard, but I'll keep on keeping on, being a hard working, decent American who can be shit on by every state & federal bureaucrat that feels the need, you should do to airline pilots what you've done to us, you won't because you know the results, or doctors, the AMA would have a fit, hell you can't even get a uniform speed limit because if state like Ohio, Mich, Ill, & the northeast would loose millions in fines from drivers, a big cash cow for states for our benefit, if I loose my license even a 3 year period for example for speeding, you loose a tax payer, I loose my truck, fire bankruptcy and they like, been there, done that already once, what's one more time, I'll dig ditches

Sincerely

PS. The self addressed David B Prince stamped post card is a fake PRINCE TRANSPORTATION
you dump these papers out POB 146 / ST RT 113

Stamp the post card "Received" Birmingham, OHIO 44181

Mail it back to make me think, Daniel Prince

DOCKET - 88-26-28-34
PAGE 10 OF 10

106 Walnut Hill Road
North Yarmouth, Maine 04097
December 19, 1996

Docket Clerk, ATTN FHWA Docket No. MC-96-28
Federal Highway Administration
Department of Transportation
Room 4232, 400 Seventh Street, SW.
Washington, D.C. 20590

36 DEC 30 12 16 PM '96
LEGIS. REGS. DIV.
ADMINIS. DIVISION

Dear Sir or Madam,

I am writing in regard to proposed changes in Hours-of -Service rules, especially as they may apply to truck drivers. I am particularly concerned about the truck drivers who are driving on our highways when they need to be resting.

I ask you to provide that the Rule Making consider the human body's natural circadian rhythm and use common sense as you consider the issues of DRIVER FATIGUE, HOURS OF SERVICE, DRIVING TIME, ON-DUTY TIME AND DRIVER PAY. It seems sensible to me that truck drivers be included in the Fair Labor Standard Act and be paid by the hour for each hour that they work rather than by the mile. Drivers who must churn out the mileage in order to earn a livable wage are the very drivers who must ignore their own body's signals of fatigue, thus endangering all motorists on the highways. I also ask you to provide that the Rule Making consider the vast amount of research that has been done about sleep needs and sleep disorders and consider requiring that questions about sleep habits be included in the medical exam form for the drivers' required physical exam.

Thank you for including my concerns in the public comment on Hours-of -Service Rule Making

Sincerely yours,



Margaret G. Jensen

copy to: P.A.T.T.

Sen. Olympia Snow
Sen. Susan Collins
Rep. Thomas Allen

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PAGE 1 OF 1

FEDERAL HIGHWAY
ADMINISTRATION

96 DEC 30 PM 12:16

12-24-96.

LEGS./REGS. DIV.

DOCKET CLERK,
Attention FHWA Docket#MC-96-28.
Federal Highway Administration,
Department of Transportation, Room 4232,
400 7th. St. SW,
Washington, DC 20590

Dear Sir,

I would like to comment on the proposed changes in the Hours of Service Rules.

I work for Consolidated Freightways as a over the road sleeper team driver out of Phoenix AZ. I have been in the Trucking business all my life in one way or another for a total of 30 years, most of it as an over the road driver.

We all know these rules were put into effect when truck could not run over 40-45 mph. and we had two lane highways, it was hard to drive 300-350 miles a day without stretching your log. Today in the west we can cover 650-700 miles in ten hours, the rules should not be one size fits all the way they are now. They should be made to fit the individual operation of a trucking company.

I will give you an example, in the east a team can run 4, 5 or 10 hrs each because of the availability of places to change drivers. In some states in the west you can go for 6 or 7 hrs. on some roads without a good place to change drivers, I'm talking about a restaurant and rest rooms not just a place to pull over and change. If we could drive 12 hrs. a day split up in either three 4 hr. or two 6 hr. or two 7 hr. breaks, the seven hr. breaks would not be in violation because it would bring you into the next day on your second driving shift. At this time we are forced to either drive 5 hr. or 8 hr. breaks in order to be within the rules. I don't know of many drivers that can stay in the bunk for 8 hrs. since most of the time on the rough roads your lucky if you can sleep 3 to 5 hrs. In the west if we could run 6 hrs on and 6 hrs. off it would help the driver to get more rest and we could stop in a place fit for a human.

DOCKET MC-96-28-36
PAGE 1 OF 2

It would be better if you would send someone out to talk to drivers that work in a sleeper team operation not just trucking company officials.

Sincerely yours,

A handwritten signature in cursive script, appearing to read 'Karl Schill', written in black ink.

Karl Schill
813 W. Gilmore St.
Winslow, AZ 86047
520-289-2210.

DOCKET mc-96-28-36
PAGE 2 OF 2

December 25, 1996

ADMINISTRATION

96 DEC 30 P12:16

LEGS./REGS. DIV.

Docket Clerk
Attention FHWA Docket # MC-96-28
Federal Highway Administration
Dept. of Transportation, Rm. 4232
400 7th Street S.W.
Washington, DC 20590

Dear FHWA,

When considering your change in trucker hours-of-service regulations, please keep in mind that given the commercial deregulation in the industry, whatever maximum you set will become the *de facto* minimum, too.

This has happened already under the current rules. Until quitting recently to attend law school, I was a truck driver for eight years. Over that time, I witnessed a steady escalation of expectations on the part of customers (with their spreading use of just-in-time supply and distribution techniques) and carriers.

Most drivers today work under a "forced dispatch" regime, where their employer tells them that refusing any load means they have quit, no discussion tolerated. Although a carrier can't openly force a driver to break or bend the law, or to drive when fatigued, drivers who resist dispatch expectations usually find themselves disfavored in all the ways that at-will employment allows management.

Carriers can't openly schedule loads that require breaking the hours-of-service rules, but they can set them up to require the maximum allowed driving time on paper. On the road, the days and weeks don't go as smoothly as they look on paper, but drivers face enormous pressure to log their time as efficiently as they can get away with, yet drive whatever it takes to meet appointments.

Some drivers pin their egos to how hard they can push themselves, and argue for looser hours-of-service regs. Safe drivers, however, recognize there's more to life than driving around the clock. If nothing else, staying healthy improves stamina, but requires regular time to exercise.

Unfortunately, the economics of the industry push all drivers to the maximum allowed. Truckers already work twice the hours most other people work. Enough is enough.

Sincerely,

Andrew Morgan
1314 Hickory Street
Madison, WI 53715

DOCKET

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PAGE

1 OF 1

- P.M. 12/17/96

James A. McCoy
P.O. Box 55
Swainsboro, Ga. 30401

FHWA Docket No. MG-96-28
Federal Highway Administration
Department of Transportation
400 Seventh Street, SW, Room 4232
Washington, DC 20590

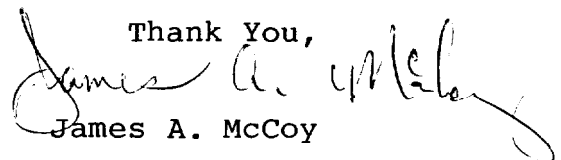
ADMINISTRATION
96 JAN 3 9:14
LEGS./REGS. DIV.

To Whom It May Concern;

I'm James A. McCoy of Swainsboro, Georgia responding to the hours-of-service regulations. I have been a professional driver for thirteen and a half years and over the years I've experienced the problems concerning shippers and consignees. During the time I hauled produce, I found it to be ridiculous how shippers rush the driver to deliver the goods because of their neglect to ship the load or prepare the load to be shipped in a timely manner.

The consignees, especially those who deal mainly with produce, cut the driver no slack what so ever. As a result, the consignees will file a claim (most of the time) if the shipment is late. The consignees are aware of the hassle a driver goes through. I think the penalties should go to the responsible party at hand.

Thank You,


James A. McCoy

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MC-96-28

December 27, 1988

REGS./REGS. DIV.

97
JAN 3 4 9:14

ADMINISTRATION

Shirley Watson
216 Worthwood Rd.
Albany, GA 31705
Phone: (912) 776-4053

My name is Shirley Watson. I am a self-employed truck-driver. I would like to offer some comments in regards to the issues of hours of service regulations and regulation of shippers and receivers.

Regarding hours of service, I feel that seventy hours per week is enough for anyone to drive. Also, in order to be safe drivers, truckers need at least eight hours of sleep every day. I would like to see parking areas for commercial vehicles only to ensure that truckers get at least eight hours of sleep each day. In many rest areas if you are lucky enough to find a parking space, you are limited to four hours or less of parking time. Most scale houses will not allow trucks to park on their grounds. Lastly, I have read that truck stops want the government to build parking lots on their grounds. I do not feel that our tax money should be used to build these parking areas since most truck stops will charge truckers to park or inflate their fuel prices to defer the cost of the parking lot. In the few truck stops that do not charge to park, truckers usually can not find a parking space because of the recreational vehicles occupying the parking spaces.

In regard to regulation of shippers and receivers, I feel we should go back to detention time. Since this was abolished the shippers have really taken advantage of truckers. It is first-come-first-serve at the loading docks unless they need the product to ship immediately. Truckers can spend all day waiting to unload and they can not get any rest for fear that they will miss the call on the C.B. radio and lose their place in line. Then a driver calls dispatch and

DOCKET MC-96-28-39
PAGE 1 OF 2

they give him a load that delivers the next morning. This leaves no time to sleep. This problem holds true for receiving as well.

Another problem with shipping and receiving is drivers being forced to unload their truck or hire a lumper. With lumpers, you can not get any sleep because of the lumpers banging on your door soliciting their services. Most of these lumpers do not pay taxes and receive welfare and/or food stamps. And they make more money than the drivers. One specific example of this problem is at the Giant food warehouse in Landover Maryland. If you refuse to hire their in-house lumper, they will put you in the back parking space until you give up or they need the product. If you unload the product yourself, you are forced to use a worn-out pallet jack that requires two people to operate it. This problem can be resolved by creating a law which states that shippers load and receivers unload.

Lastly, a problem which needs to be addressed is the trucks from Mexico and Canada. There are already more American trucks than there are loads. Now, truckers have to compete with trucks from Mexico and Canada. Mexican truckers are especially a problem because of the language barrier. I have seen Mexican drivers who do not speak one word of English. They can not read road signs or any other thing related to driving. It would be very difficult for American truckers to truck in Mexico because we would not be able to afford the bribes for a corrupt police force and insurance prices would also rise. If you are really interested in trucker's safety, these are some issues that need to be addressed. If I can be of any assistance, please do not hesitate to contact me.

Sincerely,

Shirley Watson

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PAGE 2 OF 2

1201 Lakeside Dr.
Grand Saline, TX 75746
December 26, 1996.

Docket Clerk,
Attention FHWA Docket # MC-96-28
Federal Highway Administration,
Department of Transportation,
Room 4232, 400 7th St. SW
Washington, D.C. 20540.

Gentlemen:

I am writing on behalf of my own ideas and experience involving my continuous driving career of 36 years as an over-the-road tractor-trailer-driving driver of coast-to-coast operation of Class 8, pulling Haz-Mat materials, flammables, as well as dry-van and reefer-trailer commodities.

I have a Class A-CDT, Texas License # 03275726, Date of Birth 2-22-35. My Texas CDL shows no accidents nor violations of any kind. I have had a Texas Commercial License for 40 years. I have never been involved in an accident where I received a citation or where there was an injury or fatality. I have never been adjudged as the driver faulted for any kind of a highway accident. My driver's license will verify this. My reference to this is to attempt to verify that I am a safe, competent and qualified driver on the American roadway.

LEGS./REGS. DIV.

97
JAN 7 AIO

ADMINISTRATIVE

DOCKET

PAGE 1 OF 4

04-82-96-28-40
mc-96-28-40

On Page 42 of Dec. 96 "Trucker News" Publication, Editorial office at 38 Executive Park, Suite 300, Irvine, Ca, 92614. Ph. 714-261-1636.

From my own experiences as an over-the-road driver for 40 years, I believe the main problems of Class 8 Truck safety is:

- 1) Exhausted drivers who have been forced either by Company Directors or shippers, to make a delivery or pickup that is utterly impossible to make using Hours of Service allowed by DOT Regulations. All of drivers I know of, spend 2 to 8 hours at a point getting unloaded. We are either sitting in our truck-cab waiting to be told by a receiver with a CB Radio on a designated channel when to come to the gate and get ready to unload. Of course we show this as sleeper-time. Does anyone so naively believe that we are going to show "On-Duty-Not Driving", when we are not being paid a dime for this? We will show all the work as "In-Sleeper-Berth". So after the Log-Book juggling, we have a great "8-hours-in-the-Sleeper". So after I drove for 10 hours and usually much more with no rest, I now spend another 2 to 8 hours on duty with no rest; get unloaded finally at Sysco

BUCKET
PAGE 2

04-82-96-40

Foods, Kroger, Brookshires, Bigger Bros, you name it, get a dispatch in drive 200 miles to pickup on that same day of delivery, arrive there at 4:00 P.M., get loaded by 7:00 P.M. to deliver next day at 7:00 A.M., 510 miles away. Of course I arrive on time for that delivery! I spend another 4 to 6 hours getting unloaded, get a new dispatch which sends me 300 miles to arrive at Ponchatoula, La. for a 9:00 P.M. Candy load at same day to be at Houston, Tx. next morning at 10:00 A.M. So let me ask you, when did I get my rest? Let me answer that question! I didn't! How long have we been doing this? Always, sir! How many do it? Nearly every truck on the road with a 1-Driver operation! What is the answer? Find and maintain a way to stop this cut-throat rate-cutting among manufacturers and shippers. Oh, Deregulation; they got rid of it in 1979. Now we got NAFTA! Wait until the Mexican trucks start running all over the U.S. Hey, tell the government go-roads and the politicians, "you-don't-see-Nutin" yet!

The Split Speed Limit is a dangerous thing. My own personal opinion is that 65 MPH is fast enough on the interstates. I cannot understand how times on Class 8 rigs can safely be run faster than this. Also automobiles traveling at 15+ mph faster than trucks is an invitation to disaster!

But obviously Highway Safety, like all other aspects of life is controlled by the word "GREED", and obviously "take-in-charge" are controlled by the "DOLLAR", and input from those of us who truly control other drivers' fates, are just wasting pencil-and-paper, but nonetheless, the "so-called-authorities", would do well to hear those of us who truly are committed to Highway Safety!

Have a Safe and Happy 1997,

Bryan K. Ray, Sr

ADMINISTRATION

97 JAN 14 P3: 40

REGS./REGS. DIV.

Mc-96-28

Here is my
Suggestion
I would like to
see 12 hr of Driving
a day or 84 in 7 day
Electric Log Book
like UPS
Paid by the
hr instead of by
the mile
all fine as
to giving to DTL bus
& Shipper, Dose 710
Dispatch & owner
of the Truck
and the Broker

Ken Young
PO Box 331
Paris w
53114-0381

any one that
abuse this
would get a fine
1st offense
\$1000.00 and a 3 day
aft

2 offense
10,000.00 and out of
work 10 week

3 offense
100,000.00 1 month
Shut down

K. M. J. J.

MC-96-28
January 9, 1997
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ADMINISTRATION
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Dear Federal Highway Administration

I, Philip Johnson, am glad to hear the administration is considering improving the hours of operation rules for trucks. The first hours of service principle which should be part of the rules is that men have six days to complete their work and men are to make the seventh day Holy to our Father in Heaven by not working on the seventh day except for demanding occasions. For if we do not follow the commands of the Father or Son we can expect curses from Heaven which will result in poor truck operations. I am sure a Sunday rule will add to the tranquility of our Nation.

The second principle of operation

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hours is man should sleep every night. How many hours of rest is due depends upon the level of depletion, which varies from day to day. There is a exact amount of sleep needed for good operation. If one sleeps less than the proper amount, less desirable conditions take place and likewise when one oversleeps poor conditions result. When one wakes up and senses normal conditions proper sleep has occurred.

Even with the least amount of work done two hours of rest is good every night. Therefore I say a minimum of two hours of rest every night should be the law for drivers. The length of additional rest time should be determined by someone close to the operator

such as the operators supervisor.

To help ensure two hours of rest per night, I say close the highways between midnight and two in the morning to all vehicles. There are some who may contend that they prefer to drive during those hours, to them I say a two hour break allows for many hours of evening and morning transportation. This proposed rule is superior to the current arrangements as the enforceability is greater. A violator is stopped during the violation, not after it has occurred, as is the common case with the current rules. Punishment of those who cause collisions is also in order.

The rule requirements of eight hours of sleep after ten hours of

driving should be repealed. For eight hours of sleep may be too great and cause poor driving. A diesel truck engine does most of the work moving freight along the highway. Therefore truck drivers must operate for many hours to complete a proper amount of work. The eight hour sleep rule causes many practical problems while not providing the reliability we need. Morale among truck drivers is lowered by the rule which contributes to the safety problems. We all have a common interest in minimizing truck collisions and we need rules that are enforced and work. Again, I am glad the administration is taking action towards improving the rules.

Sincerely,

Philip Johnson

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